



CERRO COPPER PRODUCTS CO.

P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

*Villme
Program
K.06
5/17/90
153593*

May 17, 1990

Mr. Carl Schafer
Patterson Schafer Inc.
39 S. LaSalle St., Suite 917
Chicago, IL 60603

RE: Pretreatment Discharge Permit

Dear Carl:

Attached is the draft of the POTW Discharge Permit for our review. The only change I noted was the description of the sampling type for Manhole 30 on Page 13. Will you please review the draft and forward your comments to me.

You will also note that we are still required to report monthly as noted in Part 2, Paragraph 5 on Page 5. However, John Thiel from Horner and Shifrin said this is only for Manhole 30 because we are not in compliance at the other manholes. I think this should be spelled out in the Permit.

If you have any questions, please call.

Very truly yours,

CERRO COPPER PRODUCTS CO.

Joseph M. Grana
Manager of Environmental
and Energy Affairs

JMG/ge

cc: P. Tandler
S. Franzetti

Encl.



A member of The Marmon Group of companies

C05213

VILLAGE OF SAUGET

AMERICAN BOTTOMS REGIONAL WASTEWATER DISCHARGE PERMIT

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VILLAGE OF SAUGET

AMERICAN BOTTOMS REGIONAL WASTEWATER DISCHARGE PERMIT

Permit No. 108

In accordance with all terms and conditions of Ordinance 567 of the Village of Sauget; the 1977 Regional Agreement as amended; Section 46 of the Illinois Environmental Protection Act of 1970 (Ill. Rev. Stat. 1987. Ch. 111/2, Sec. 1046) as amended; and Ill. Rev. Stat. 1987, Ch. 24, Sec. 11-141-7; permission is hereby granted to:

Cerro Copper Products Co.

(name of industry)

Highway 3 and A&S Tracks

(address)

Sauget, Illinois 62202

Classified Standard Identification Code (SIC) No. 3341, 3351

Subject to the National Categorical Pretreatment Standard (NCPS) No. _____

40 CFR: 421.65; 464.25 B,F; 468.14 A,D,K,M,Q

to discharge industrial wastewater into sewer lines tributary to the American Bottoms Regional Wastewater Treatment Plant.

This permit is granted in accordance with the application filed on the 28th day of the month of February, in the year of 1990 in the office of the Regional Plant Manager, #1 American Bottoms Road, Sauget, Illinois 62201, and in conformity with plans, specifications and other data submitted in support of the above application, all of which are filed with and considered as a part of this permit, together with the attached conditions and requirements.

Nothing herein shall be construed as a permit or is permission for the permittee to violate the provisions of any sewer use ordinance in effect within the jurisdiction of any unit of local government in which the permittee's facility is located.

Effective this 15th day of June, 1990

To expire the 15th day of June, 1991

VILLAGE OF SAUGET

By: _____

Regional Plant Manager

PART 1 - GENERAL CONDITIONS OF PERMIT

1. General - This Wastewater Discharge Permit shall be expressly subject to all provisions of Ordinance 567 of the Village of Sauget and all other applicable regulations, user charges, and fees established by the Village of Sauget. In consideration of the granting of this permit and compliance with the Ordinance, the permittee shall comply with all provisions of the Ordinance, permit conditions, and the Standard Operating Procedures including but not limited to the specific requirements of these General Condition Articles.
2. Prohibitive Standards - The permittee shall comply with all prohibitive discharge standards pursuant to Paragraph 3.2 of the Ordinance and all Local, State, and Federal discharge limits as outlined in the Permit.
3. Monitoring Facilities - The permittee shall install and operate monitoring facilities and afford the POTW access thereto; pursuant to Paragraph 4.5 of the Ordinance.
4. Inspection of Facilities and Records - The permittee shall allow the POTW or its representatives ready access upon presentation of credentials at reasonable times to all parts of its premises in which a discharge source or treatment system is located or in which records required by this Ordinance are kept for the purposes of inspection, sampling, examination and photocopying of said records and for the performance of any of their duties; pursuant to Paragraph 4.6.1 of the Ordinance.
5. Retention of Records - The permittee shall retain for a minimum of three years any records of monitoring activities and results relating to wastewater discharge and for affording the POTW access to said records; pursuant to Paragraphs 4.6.3, 4.6.4 of the Ordinance.
6. Change in Conditions - The permittee shall provide advance notification to the POTW of any material and substantial change in the type, quality, or volume of the wastewater constituents being introduced into the wastewater treatment system; pursuant to Paragraph 4.2.6 of the Ordinance.
7. Prohibition of Improper Dilution - Improper dilution shall be prohibited pursuant to Paragraph 3.8 of the Ordinance.
8. Spill Containment and Unlawful Discharge - Spill Containment procedures and notification of slug, accidental and/or deliberate discharges shall be required pursuant to Paragraph 3.9 of the Ordinance.

9. Transfer - Wastewater Discharge Permits are issued to a specific Significant Industrial User for the process activity specified in the permit. A Wastewater Discharge permit shall not be assigned, transferred or sold to a new owner or new user in different premises or to a new or changed operation in the same or different premises without the approval of the Village of Sauget; pursuant to Paragraph 4.2.9 of the Ordinance.
10. Permit Modifications - The terms and conditions of this permit may be subject to modifications by the Village of Sauget during the term of this permit; pursuant to Section 4.2.8 of the Ordinance.
11. Pretreatment - The permittee shall comply with all necessary pretreatment requirements pursuant to Paragraph 3.7 of the Ordinance.
12. Additional Information - The permittee shall furnish any additional information as may be reasonably requested by the Village of Sauget from time to time.

PART 2 - GENERAL REPORTING REQUIREMENTS

1. General - The General Pretreatment Regulations of 40 CFR 403.12 and Ordinance 567 have set forth basic reporting requirements that apply to Significant Industrial Users (SIUs). Reporting requirements include the following General Reporting Requirements.
2. Periodic Compliance Report - The permittee shall submit to the Village of Sauget during the months of June and December for the preceding two calendar quarters unless required more frequently in the Pretreatment Standard or by the POTW or IEPA, a certified report indicating the nature and concentration of pollutants in the effluent which are limited by such applicable Pretreatment Standards. In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period. The requirements of this reporting are described in Paragraph 4.4.3 of the Ordinance and the Standard Operating Procedures, Part III, Paragraph 3.4.3.
3. Incremental Compliance Report - This report is required should the Baseline Monitoring Report (if applicable) or the Periodic Compliance Report reflect that the Significant Industrial User is not in compliance with its pretreatment standards and/or its compliance schedule. The requirements for this report are described in the Standard Operating Procedures, Part III, Paragraph 3.4.4 and Paragraph 4.4.2.
4. Notice of Unlawful Discharge - The permittee shall submit to the Village of Sauget an oral report detailing any unlawful discharge and a follow-up written report as described in Paragraph 3.9 of the Ordinance and Part III, Paragraph 3.4.6 of the Standard Operating Procedures.

5. Monitoring Reports - Monitoring results obtained shall be summarized and reported on a monthly basis. The report is due on or before the 30th day of each succeeding month after the sampling was performed. The report shall indicate the nature and concentration of all pollutants in the wastewater discharges which are regulated by the standards set forth in this Permit and include measured maximum and average daily flows.
6. Report Submittal - All reports required by this Permit shall be submitted in triplicate to:

Village of Sauget
c/o American Bottoms Regional Wastewater Treatment Facility
#1 American Bottoms Road
Sauget, Illinois 62201
Attn: Pretreatment Coordinator

PART 3 - SAMPLING AND TESTING REQUIREMENTS

Section 1 - General

- A. All Significant Industrial Users (SIUs) are responsible for compliance sampling. The monitoring facilities designated by this permit are shown on Figure 1.

Compliance sampling addresses the sampling and testing requirements to demonstrate continued compliance with pretreatment standards. Compliance sampling relates to pollutants for which local, state, and national categorical limits exist, and any other parameters identified by the Village of Sauget in this permit.

- B. Compliance monitoring results and frequencies shall be reviewed annually by the Village of Sauget and appropriate adjustments made to frequencies and parameters in an updated Wastewater Discharge Permit. Pollutants and frequencies for compliance sampling are cited hereafter.
- C. All handling and preservation of collected samples and laboratory analyses shall be performed in accordance with procedures contained in 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit. Composite sampling, where called for, shall be performed over a twenty-four (24) hour period by flow or time proportionate methods.

The test procedures for all samples shall conform to one of the approved test methods which provides the most sensitive detection limits for the pollutant under investigation listed in the current issue of the Code of Federal Regulations, and the most recent addendum published by the Federal Register. The testing for priority organic pollutants shall be

conducted utilizing gas chromatograph/mass spectrometer (GC/MS) methods and procedures. For Volatile Organic Compounds, Phenols, Oil and Grease, and pH, at least one (1) grab sample will be collected in the same twenty-four (24) hour period as the composite sampling is performed. Other procedures may be exercised, pursuant to Section 4.6.2 of the Ordinance.

- D. The appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.
- E. For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain and submit records which include:
 - 1. The date, exact place, method and time of sampling;
 - 2. The names of the person or persons taking the samples;
 - 3. The dates analyses were performed;
 - 4. Who performed the analyses;
 - 5. The analytical techniques/methods used; and
 - 6. The results of such analyses.
 - 7. The average daily and maximum daily flows.

SECTION 2 - COMPLIANCE SAMPLING

A. Effluent Discharge Limits

1. Local Limits: The Village of Sauget reserves the right, by Ordinance 567, to establish limitations or requirements on discharges to the wastewater disposal system if deemed necessary to comply with the objectives presented in Section 1.1 of the Ordinance.

<u>Parameter</u>	<u>Limitations</u>
N.A.	

2. State Limits: These limits are stated in 35 Ill. Adm. Code Part 307. This Part 307 places restrictions on the types, concentrations, and quantities of contaminants which can be discharged into sewer systems in the State.

<u>Parameter</u>	<u>Limitations</u>
Mercury	0.0005 (mg/L) (Max. Month Avg.)
Cyanide (Total)	10.0 (mg/L) ¹ (Max. Grab)

3. National Categorical Pretreatment Standards (NCPS): NCPS are standards published by USEPA and contain numerical limits for the discharge of pollutants from specified industrial categories. These categorical standards have been or will be developed for industrial categories determined to be the most significant sources of pollutants. Alternate limits are based on calculations and supporting data submitted by the Industrial User for use of the combined wastestream formula of 40 CFR Section 403.6(e). As indicated by the Industrial User, the alternate limits will be enforced by compliance sampling and other provisions of this permit. Your operations are subject to the following limits:

¹ Provided any sample tested shall not release more than 2 mg/L of cyanide when tested at a pH of 4.5 and at a temperature of 66 C (150 F) for a period of 30 minutes.

<u>NCPS</u>	<u>Parameter</u>	<u>Limitations</u>	
		<u>1-Day</u> <u>Max.</u>	<u>Max</u> <u>Month Avg.</u>
421.65	No discharge of process wastewater pollutants		
464.25 B ¹	Copper (T)	0.928	0.506
	Lead (T)	0.639	0.314
	Zinc (T)	0.916	0.350
464.25 F ²	Copper (T)	1.81	0.988
	Lead (T)	1.25	0.612
	Zinc (T)	1.79	0.673
	Total Phenols	2.02	0.706
	TTO ³	5.41	1.77
	Oil & Grease	70.6	23.5
468.14 A ^{4,5}	Cr	0.045	0.018
	Cu	0.195	0.103
	Pb	0.015	0.013
	Ni	0.197	0.130
	Zn	0.150	0.062
	TTO ³	0.066	0.035
	Oil & Grease	2.060	1.236
468.14 D ^{4,5}	Cr	0.284	0.116
	Cu	1.227	0.646
	Pb	0.096	0.083
	Ni	1.240	0.820
	Zn	0.943	0.394
	TTO ⁵	0.419	0.219
	Oil & Grease	12.920	7.752

-
- 1 Units are lb. per 10⁶ lb. of metal poured.
 - 2 Units are pounds per billion SCF of air scrubbed.
 - 3 The TTO standard is based on the application of oil and grease removal, thus if oil and grease is monitored at the given level, compliance with TTO is ensured.
 - 4 mg/off-kg (mg/off-lb) of copper or copper alloy formed and removed from one process for transfer to another process.
 - 5 Compliance with the monthly discharge limit is required regardless of the number of samples analyzed and averaged.

<u>NCPS</u>	<u>Parameter</u>	<u>Limitations</u>	
		<u>1-Day</u> <u>Max.</u>	<u>Max</u> <u>Month Avg.</u>
468.14 K ^{4,5}	Cr	0.574	0.235
	Cu	2.481	1.306
	Pb	0.195	0.169
	Ni	2.507	1.658
	Zn	1.906	0.796
	TTO ³	0.848	0.444
	Oil & Grease	26.120	15.672
468.14 M ^{4,5}	Cr	0.051	0.020
	Cu	0.220	0.116
	Pb	0.017	0.015
	Ni	0.222	0.147
	Zn	0.169	0.070
	TTO ³	0.075	0.039
	Oil & Grease	2.320	1.392
468 Q ^{4,5}	Cr	0.009	0.003
	Cu	0.041	0.021
	Pb	0.003	0.002
	Ni	0.041	0.027
	Zn	0.031	0.013
	TTO ³	0.014	0.007
	Oil & Grease	0.436	0.261

421.65 No discharge of process wastewater pollutants.

-
- 3 The TTO standard is based on the application of oil and grease removal, thus if oil and grease is monitored at the given level, compliance with TTO is ensured.
 - 4 mg/off-kg (mg/off-lb) of copper or copper alloy formed and removed from one process for transfer to another process.
 - 5 Compliance with the monthly discharge limit is required regardless of the number of samples analyzed and averaged.

B. Monitoring Requirements

Copper Forming Limits at East Outfall (12-C):

<u>Pollutant</u>	Daily Maximum Limit <u>lbs/day</u>	Monthly Average Limit <u>lbs/day</u>
Copper	1.395	0.734
Chromium	0.330	0.131
Lead	0.109	0.093
Nickel	1.409	0.932
Zinc	1.071	0.447
Total Toxic Organics	0.476	0.249
Oil and Grease	14.692	8.814

Compliance with the above limits will be determined by measurement of pollutant discharge at both the East Outfall and manhole 8A. The value resulting from the subtraction of the value at 8A from the value at the East Outfall will be considered the Copper Forming discharge subject to the above limitations. In the event that the value from 8A exceeds the East Outfall, the entire discharge at the East Outfall will be attributed to 8A for that monitoring period.

Copper Forming Limits at Lift Station, 3B:

<u>Pollutant</u>	Daily Maximum Limit <u>lbs/day</u>	Monthly Average Limit <u>lbs/day</u>
Copper	0.338	0.178
Chromium	0.078	0.032
Lead	0.026	0.023
Nickel	0.341	0.226
Zinc	0.259	0.108
Total Toxic Organics	0.115	0.060
Oil and Grease	3.558	2.134

Compliance with the above limits will be determined by measurements of pollutant discharge at the lift station, 3B.

Secondary Copper Limits at Manhole 8A:

There shall be no discharge of process wastewater pollutants to the POTW.

Compliance with this limit will be determined by measurement of pollutant discharge at manhole 8A.

Copper Casting Limits at Manhole 30:

1. The MMC pretreatment facility discharges (as a batch operation) wastewater from two days of production. Therefore, each batch is subject to the following effluent limitations, representing limitations based on two days of production. These limitations do not apply if any other procedure than discharge of two days of production occurs. Cerro must inform the USEPA if other forms of discharge will occur.
2. The average of all the batch discharges sampled during the month must meet the monthly average limit (based on lbs/day, not lbs/batch).

<u>Pollutant</u>	<u>Batch Discharge Limit lbs/batch</u>	<u>Monthly Average Limit lbs/day</u>
Copper	3.026	0.825
Lead	2.086	0.512
Zinc	2.990	0.570
Total Toxic Organics	0.450	0.074
Oil and Grease	5.584	0.978
Phenols (4AAP)	0.170	0.029

Compliance with the above limits will be determined by measurement of pollutant discharges at manhole 30.

Alternate Limits at Combined Monitoring Location (West Outfall):

After October 31, 1988, Cerro Copper may choose to use a combined monitoring point for compliance with Copper Forming wastewater from the lift station, 3B, and Copper Casting wastewater from manhole 30. Cerro shall give the Village advance written notice no later than fifteen (15) calendar days before exercising its rights under this paragraph. Should Cerro decide to use this combined point, the following limits will apply at the West Outfall. Cerro must be able to continue to meet the appropriate limits at 30 and 3B if combined monitoring occurs. The combined monitoring point can only be used with the Combined Wastestream Formula (CWF). Since chromium, nickel, and phenols are not limited by Copper Forming, information about the concentration in the Copper Forming wastestream must be used to determine the correct unregulated values for those three pollutants to use in the CWF. Should any of these values result in a limit below detection, the CWF cannot be used to derive alternate limits.

<u>Pollutant</u>	Daily Maximum Limit <u>lbs/day</u>	Monthly Average Limit <u>lbs/day</u>
Copper	1.851	1.003
Chromium	(1)	(1)
Lead	1.21	0.544
Nickel	(1)	(1)
Zinc	1.759	0.678
Total Toxic Organics	0.340	0.134
Oil and Grease	6.495	3.112
Phenols (4AAP)	(1)	(1)

Compliance with the above limits will be determined by measurement of pollutant discharge at the West Outfall.

¹ To be determined by use of CWF and information on the background concentration in the Copper Forming wastestream.

C. Monitoring Schedule

	Units		Type(1)			Location/Frequency(2)(3)				
	MGD	mg/l lbs/d	Meter	Composite	Grab	WOF	EOF	8A	3B	30
Flow	X		X			M	M	M	M	Q
Mercury		X		X		M	M			
Cyanide		X			X	M	M			
Copper				X			M	M	M	Q
Lead				X			M	M	M	Q
Zinc				X			M	M	M	Q
Nickel				X			M	M	M	
Chromium				X			M	M	M	
TTO's										
Volatile					X		M	M	M	Q
Semi-Volatile				X			M	M	M	Q
Non-Volatile				X			M	M	M	Q
Phenols (4AAP)					X					Q
Oil and Grease					X			(4)		

-
- 1 All parameters regulated at Manhole 30 shall be analyzed from a grab sample
 - 2 M = Monthly
Q = Quarterly
 - 3 WOF = West Outfall
EOF = East Outfall
 - 4 Alternative for TTOs (See Section 2A3)

PART 4 - COMPLIANCE SCHEDULE

A. General:

Authority Citation: Section 4.2.5, Village of Sauget Pretreatment Ordinance No. 567.

Permit No. 108

Industry Name: Cerro Copper Products Company

B. Partial Compliance Schedule -- Copper Forming:

Compliance schedules for Copper Forming are the subject of pending litigation between USEPA and Cerro. Cerro shall, on a monthly basis, report the compliance status and progress schedule regarding this litigation.

C. Compliance Schedule Reporting: No later than 14 days following each date in the above schedule, the permittee shall submit to the POTW an incremental compliance report including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with the increment of progress, the reasons for delay, and the steps being taken to return the project to the schedule established.

PART 4 - COMPLIANCE SCHEDULE

A. General:

Authority Citation: Section 4.2.5, Village of Sauget Pretreatment
Ordinance No. 567.

Permit No. 108

Industry Name: Cerro Copper Products Company

B. Partial Compliance Schedule -- Secondary Copper:

Compliance schedules for Secondary Copper are the subject of pending litigation between USEPA and Cerro. Cerro shall, on a monthly basis, report the compliance status and progress schedule regarding the litigation.

C. Compliance Schedule Reporting: No later than 14 days following each date in the above schedule, the permittee shall submit to the POTW an incremental compliance report including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with the increment of progress, the reasons for delay, and the steps being taken to return the project to the schedule established.